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Via ECFS

February 28, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: *In the Matter of ETC Annual Reports and Certifications*, WC Docket
No. 14-58: Connect America Fund Phase II Broadband Deployment
Location Data**

Dear Ms. Dortch:

In connection with the FCC's November 18, 2011 *USF/ICC Transformation Order* in WC Docket Nos. 10-90, *et al.*, CenturyLink provides this letter regarding submission and certification of Connect America Fund Phase II (CAF II) broadband deployment location data in the USAC High Cost Universal Broadband (HUBB) portal.

CenturyLink has previously submitted and certified CAF II broadband deployment location data in the HUBB for the 2015, 2016, and 2017 program years. CenturyLink also recently submitted and certified broadband location deployment data for new latitude and longitude points in 2018.¹ To provide a more accurate report of CenturyLink's CAF II broadband deployment as of December 31, 2018, however, CenturyLink also needed to make certain modifications to the data that it had previously submitted to the HUBB. Due to current HUBB portal restrictions on data modifications, CenturyLink was unable to make those changes.

As currently configured, the HUBB portal will only accept records with new geospatial points (latitude and longitude). Any location record previously loaded into the portal and certified can only be amended to change speed tiers, address, and number of units and these changes can only be made on a location-by-location basis. There is no ability to make changes to certified data in an automated or bulk manner. Latitude, longitude, and date of deployment cannot be

¹ To be clear, CenturyLink interprets that its HUBB certifications are made only with respect to the current deployment year filing locations that are being added to the HUBB. Those certifications do not bind CenturyLink or represent certifications as to the accuracy of location data that have been submitted in the HUBB prior to the 2018 filing.

changed on a certified location record. Additionally, a submitting provider cannot delete a location record in the HUBB (whether certified or not) after the filing deadline. These constraints are inconsistent with the simple reality that things change, particularly with the techniques used by geocoding software, and these changes were at least to some degree anticipated by the FCC and USAC as reflected in USAC's Geolocation Methods guide.²

To facilitate an orderly upload of the broadband deployment location data into the HUBB, CenturyLink's representative has certified the submission with a request that a supplemental filing also be made with the FCC and USAC to state that the company's complete broadband deployment location data as of December 31, 2018 differs from the cumulative data currently contained in the HUBB. The cumulative data in the HUBB inaccurately represents the current status and/or information for some locations reported in prior years and, consequently, it is an inaccurate representation of the total number of locations to which CenturyLink has deployed broadband under the program as of year-end 2018, by overstating the number of locations in most states and understating the number in a few.

As a result, the data currently in the HUBB does not have accurate information on CenturyLink's deployment for meeting the second interim milestone. CenturyLink's complete data for year-end 2018 reflects that CenturyLink met the sixty percent milestone in twenty-three states and did not meet the milestone in ten states: Colorado, Idaho, Kansas, Michigan, Minnesota, Missouri, Ohio, Oregon, Washington, and Wisconsin.³ CenturyLink hereby certifies that it has met the second interim milestone in all its states other than those just noted.

Additionally, in reporting its broadband deployment location data for year-end 2018, CenturyLink has modified its reporting methodology to address concerns recently raised in USAC's audit of CenturyLink's broadband deployment reporting as of year-end 2017. Because of those changes, however, there is now data in the HUBB for CenturyLink's overall program deployment based on two different reporting methodologies and this will remain the case until the HUBB can more fully accommodate changes to previously reported data. Meanwhile, CenturyLink's comprehensive filing reflects CenturyLink's broadband deployment under the program through year-end 2018 based only on the revised reporting methodology.

CenturyLink understands and appreciates that the FCC and USAC are evaluating modifications to the HUBB that would enable companies to make certain changes to prior year deployment data. If the restrictions in the HUBB are modified, then CenturyLink should be able to update

² See Geolocation Methods: A Guide to Successfully Collecting Broadband Deployment Data, <http://www.usac.org/res/documents/hc/pdf/tools/HUBBGeolocationMethods.pdf> (discussing automated address geocoding as one of three methods for gathering geolocation data and noting the pros and cons of each method).

³ By letter dated January 15, 2019, CenturyLink stated that it might have missed the milestone in Montana, but further review of CenturyLink's data confirmed that CenturyLink met the milestone in Montana. Letter from Jeffrey S. Lanning, CenturyLink, to Marlene H. Dortch, FCC, WC Docket No. 10-90, *In the Matter of Connect America Fund* (Jan. 15, 2019).

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its location data in the HUBB to more accurately reflect its broadband enablement status under the CAF II program as of December 31, 2018. In the interim, CenturyLink is separately providing a complete record of its December 31, 2018 CAF II broadband deployment location data to USAC.⁴

Please contact me via the above contact information if you have any questions.

Sincerely,

/s/ Jeffrey S. Lanning

cc: Alexander Minard, FCC, alexander.minard@fcc.gov
hccerts@usac.org

⁴ CenturyLink provided a similar comprehensive report to USAC last year with respect to its year-end 2017 CAF II broadband deployment.